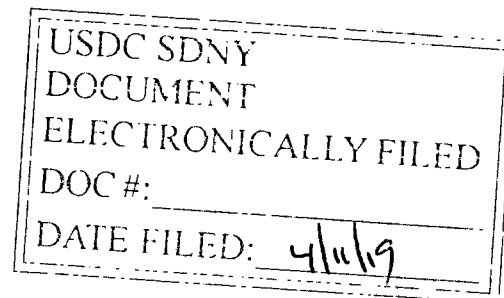


001119

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
REGINALD FOWLER and :  
RAVID YOSEF, :  
:  
Defendants. :  
- - - - - X



SEALED SUPERSEDING  
INDICTMENT

(S1) 19 Cr.

**19 CRIM 254**

COUNT ONE

(Conspiracy to Commit Bank Fraud)

The Grand Jury charges:

1. From at least in or about February 2018, up to and including in or about October 2018, in the Southern District of New York and elsewhere, REGINALD FOWLER and RAVID YOSEF, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to execute, and attempt to execute, a scheme and artifice to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, FOWLER opened numerous U.S.-based business bank accounts at several different banks, and in opening and using these accounts

FOWLER and YOSEF falsely represented to those banks that the accounts would be primarily used for real estate investment transactions even though FOWLER and YOSEF knew that the accounts would be used, and were in fact used, by FOWLER, YOSEF, and others to transmit funds on behalf of an unlicensed money transmitting business related to the operation of cryptocurrency exchanges.

(Title 18, United States Code, Section 1349.)

**COUNT TWO**  
(Bank Fraud)

The Grand Jury further charges:

2. From at least in or about February 2018, up to and including in or about October 2018, in the Southern District of New York and elsewhere, REGINALD FOWLER and RAVID YOSEF, the defendants, and others known and unknown, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, FOWLER and YOSEF opened and used numerous bank accounts at financial institutions that were insured by the Federal Deposit

Insurance Corporation, including a bank based in Manhattan, New York, and in so doing falsely represented to these financial institutions the accounts would be primarily used for real estate investment transactions even though FOWLER and YOSEF knew that the accounts would be used, and was in fact used by FOWLER, YOSEF and others, to transmit funds on behalf of an unlicensed money transmitting business related to the operation of cryptocurrency exchanges.

(Title 18, United States Code, Sections 1344 & 2.)

**COUNT THREE**

(Conspiracy to Operate an Unlicensed Money Transmitting Business)

The Grand Jury further charges:

3. From in or about February 2018 up to and including in or about October 2018, in the Southern District of New York and elsewhere, REGINALD FOWLER, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, operation of an unlicensed money transmitting business, in violation of Title 18, United States Code, Section 1960.

4. It was a part and object of the conspiracy that REGINALD FOWLER, the defendant, and others known and unknown, did knowingly conduct, control, manage, supervise, direct, and

own all or part of an unlicensed money transmitting business affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1960.

Overt Act

5. In furtherance of the conspiracy, and to effect the illegal objects thereof, REGINALD FOWLER, the defendant, together with others known and unknown, committed the following overt act, in the Southern District of New York and elsewhere:

a. On or about August 8, 2018, FOWLER opened a bank account with a bank in Manhattan, New York, for the purpose of conducting an unlicensed money transmitting business.

(Title 18, United States Code, Section 371.)

COUNT FOUR

(Operation of an Unlicensed Money Transmitting Business)

The Grand Jury further charges:

6. From at least in or about February 2018 up to and including in or about October 2018, in the Southern District of New York and elsewhere, REGINALD FOWLER, the defendant, and others known and unknown, did knowingly conduct, control, manage, supervise, direct, and own all or part of an unlicensed money transmitting business affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1960.

(Title 18, United States Code, Sections 1960 & 2.)

**FORFEITURE ALLEGATIONS**

7. As a result of committing the offenses charged in Counts One and Two of this Indictment, REGINALD FOWLER and RAVID YOSEF, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any and all property constituting or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses and the following specific property:

a. Any and all funds seized on or about October 23, 2018 from HSBC Bank USA account 141000147, held by Global Trading Solutions LLC;

b. Any and all funds seized on or about October 23, 2018 from HSBC Bank USA account 697825922, held by Reginald D. Fowler;

c. Any and all funds seized on or about October 23, 2018 from HSBC Securities USA account HMB861668, held by Reginald D. Fowler;

d. Any and all funds seized on or about November 16, 2018 from HSBC Securities USA/Pershing LLC account HMB861668, held by Reginald D. Fowler;

e. Any and all funds seized on or about November 16, 2018 from HSBC Securities USA/Pershing LLC account HMB878886, held

by Global Trading Solutions LLC.

8. As a result of committing the offenses alleged in Counts Three and Four of this Indictment, REGINALD FOWLER, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offenses, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses and the following specific property:

a. Any and all funds seized on or about October 23, 2018 from HSBC Bank USA account 141000147, held by Global Trading Solutions LLC;

b. Any and all funds seized on or about October 23, 2018 from HSBC Bank USA account 697825922, held by Reginald D. Fowler;

c. Any and all funds seized on or about October 23, 2018 from HSBC Securities USA account HMB861668, held by Reginald D. Fowler;

d. Any and all funds seized on or about November 16, 2018 from HSBC Securities USA/Pershing LLC account HMB861668, held by Reginald D. Fowler;

e. Any and all funds seized on or about November 16, 2018 from HSBC Securities USA/Pershing LLC account HMB878886, held by Global Trading Solutions LLC.

Substitute Asset Provision

9. If any of the above described forfeitable property, as a result of any act or omission of the defendants:

a. Cannot be located upon the exercise of due diligence;

b. Has been transferred or sold to, or deposited with, a third person;

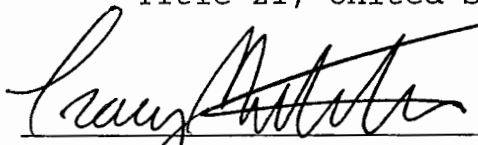
c. Has been placed beyond the jurisdiction of the Court;

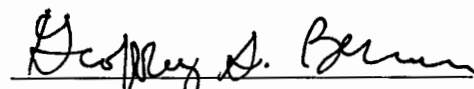
d. Has been substantially diminished in value; or

e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;  
Title 21, United States Code, Section 853.)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

*Sealed Superseding Indictment  
Judge not born  
Remain under seal  
4/11/19*

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

REGINALD FOWLER and  
RAVID YOSEF,

Defendants.

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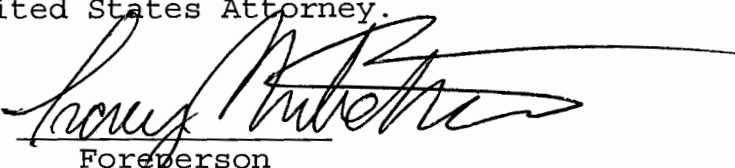
SUPERSEDING INDICTMENT

S1 19 Cr.

(18 U.S.C. §§ 371, 1344, 1349, 1960, and  
2)

GEOFFREY S. BERMAN  
United States Attorney.

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Foreperson

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